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District Counsel

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 N. Cherry St.
Tulare, CA 93274

CASE NO. 17-13797

Chapter 9

DC No.: WW-8

Date: November 30, 2017
Time: 9:30 a.m.
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

**DECLARATION OF DANIELLE J. BETHEL IN SUPPORT OF DEBTOR'S MOTION
FOR AN ORDER LIMITING NOTICE PURSUANT TO 11 U.S.C. §§ 102, 105(A) AND
901 AND BANKRUPTCY RULES 2002(m) AND 9007**

I, Danielle J. Bethel, hereby declare as follows:

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1 1. My name is Danielle J. Bethel. I am attorney at Walter Wilhelm Law
2 Group ("W2LG") which is Chapter 9 counsel for the Debtor. This proceeding was
3 commenced by the filing of a voluntary petition.

4 2. W2LG maintains an office at 205 E. River Park Circle, Suite 410, Fresno,
5 California 93720.

6 3. I have personal knowledge that the facts set forth in this declaration are
7 true, except on those matters stated on information and belief, which I believe to be
8 true. If I were called as a witness in connection with this proceeding, I could and would
9 testify competently to the matters stated herein.

10 4. This Motion is brought pursuant to 28 U.S.C. § 1334 and seeks an order
11 pursuant to 11 U.S.C. §§ 102(1), 105(a), 901, FRCP 5(b), BR 2002, and BR 9007.

12 5. The number of creditors, attorneys, and other interested parties who
13 would otherwise be noticed without the relief requested is quite large. I estimate that
14 the current master mailing list for this cases composes at least 750 persons.

15 6. There may be numerous requests for relief on a host of matters.

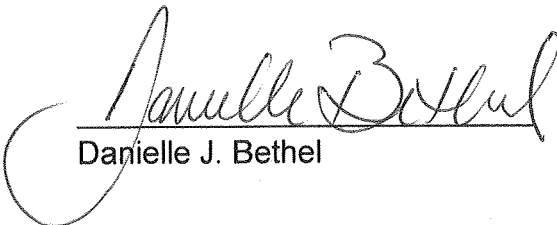
16 7. It would not be beneficial to be required to give every notice to every
17 creditor or party in interest on the master mailing matrix because of the cost and time
18 required to mail out such notices every time a matter arises affecting the administration
19 of the estate.

20 8. In any event, any person who wants to be noticed on every motion and
21 application filed may make a request for Special Notice by filing the appropriate
22 documents with the Bankruptcy Court and serving a copy upon counsel.

23 9. Notice of hearings on approval of disclosure statements, confirmation of
24 plans, dismissals, conversion, and modification of plans will not be governed by the
25 requested order.

26 10. I believe that sound business judgment, and the fact that creditors and
27 interested parties will not be harmed by limiting the notice requirements in the manner
28 requested warrant approval of the Motion.

1 I so declare and represent that the foregoing is true and correct and that this
2 Declaration is executed at Fresno, California, on November 16, 2017.

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6 Danielle J. Bethel
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